

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

JESUS R. SANCHEZ, on behalf of himself)
and all others similarly situated)
)
Plaintiff,)
)
v.) **2:11-cv-02548-STA-cgc**
)
VERIFIED PERSON, INC.,)
)
Defendant.)

SCHEDULING ORDER

1. Bifurcation: Due to the complex nature of this case and issues related to class certification, the Parties seek the bifurcation of discovery related to class certification issues. The Parties agree that merits discovery shall not commence until after the Court has ruled on a motion by Plaintiff for class certification. The parties further agree to a supplemental scheduling conference with respect to merits discovery after the court's ruling with respect to class certification.
2. Class Certification Discovery: Fact discovery related to class certification issues shall be for a period of **five months**, completed by **March 12, 2012**.
3. Expert Witnesses related to class certification: Plaintiff shall disclose Rule 23 expert witnesses and provide those reports on or before **April 12, 2012**. Defendant shall depose plaintiff's Rule 23 expert witnesses on or before **May 11, 2012** and provide a Rule 23 expert witness report on or before **May 11, 2012**. Plaintiff shall depose Defendant's Rule 23 witnesses on or before **June 10, 2012**.

4. Rule 23 Motion: Plaintiff's Rule 23 Motion shall be filed on or before **June 30, 2012.**

Defendant may file a response within **30 days of the date** from which Plaintiff's motion is filed. Plaintiff may file a Reply within **15 days of the date** on which the Response is filed.

5. INITIAL DISCLOSURES PURSUANT TO Fed.R.Civ.P. 26(a)(1):

14 days after the Rule 16(b) conference (October 12, 2011), or on or before **October 26, 2011.**

6. Joining Parties: Within 3 months after the October 12, 2011 Rule 16(b) conference.

7. Amending Pleadings: Within 3 months after the October 12, 2011 Rule 16(b) conference.

8. Initial Motions to Dismiss: Within 3 months after the October 12, 2011 Rule 16(b) conference.

9. Electronic Discovery: Disclosure of discovery of electronically stored information will be handled by producing electronically stored information in electronic form. Counsel have discussed the categories of electronically stored information that may be the subject of discovery and are making efforts to determine the accessibility of such information.

This order has been entered after consultation with trial counsel pursuant to notice. Absent good cause shown, the scheduling dates set by this order will not be modified or extended.

IT IS SO ORDERED this 11th day of October, 2011.

s/ Charmiane G. Claxton
CHARMIANE G. CLAXTON
United State Magistrate Judge